

EXHIBIT 1



Leena V <leenav@gmail.com>

Fw: Varughese Deposition

ronald j. wronko <ron@ronwronkolaw.com>
Reply-To: "ronald j. wronko" <ron@ronwronkolaw.com>
To: Leena Varughese <leenav@gmail.com>

Tue, May 21, 2013 at 5:14 PM

Is there a question about your boyfriend attending?

Ronald J. Wronko, Esq.
Ronald J. Wronko, LLC
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Florham Park, NJ 07932
(973) 360-1001
(973) 360-1881 (facsimile)
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----- Forwarded Message -----

From: "McEvoy, Rory" <RMcEvoy@edwardswildman.com>
To: ronald j. wronko <ron@ronwronkolaw.com>
Sent: Tuesday, May 21, 2013 3:43 PM
Subject: RE: Varughese Deposition

What you propose is acceptable to me. You are correct that Judge MacMahon gave us thirty days to complete Dr. Varughese's deposition after the mediation was completed. I agree that the mediation was not concluded until mid-May so there is no need to request an additional extension from the Court, if we complete the deposition by June 13. To be clear on the dates, the first day of plaintiff's deposition will be this Thursday, May 23. The second and third days will be on June 11 and June 12. We will hold June 13 as a fourth day, if needed. While I certainly hope not to need the fourth day, that will depend on how much progress we make and how cooperative Dr. Varughese is at the deposition. Finally, and to avoid unnecessary delay on Thursday, I will not agree to permit anyone to attend the deposition other than you and Dr. Varughese. If Dr. Varughese wants someone to accompany her to the deposition (like her boyfriend), he is welcome to sit in our reception area while the deposition is going on. If this presents a problem, please let me know promptly so that the issue can be resolved tomorrow and we can avoid wasting time on Thursday.

Rory J. McEvoy
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From: ronald j. wronko [mailto:ron@ronwronkolaw.com]

Sent: Monday, May 20, 2013 6:43 PM

To: McEvoy, Rory

Subject: Re: Varughese Deposition

I have calendared events in the time period you are requesting as well as during the following two weeks. I consent to an extension of time to complete plaintiff's deposition and to adjust the discovery schedule accordingly moving forward. Please keep in mind that we were still in discussions with the mediator into the middle of May. Our original request set 30 days out from the completion of mediation. I have a trial that has been adjourned four times scheduled for May 29. It is a strong likelihood I will be assigned out. I want to give you firm dates that do not have to be rescheduled and propose June 11 and 12. I am also available on June 13th in the event a fourth day is necessary. However, it is my expectation that three calendar days should give you sufficient time to complete the deposition. The recordings have been forwarded by overnight mail today, which would give you sufficient time before June 11 to fully review them. Please advise whether the above is acceptable.

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From: "McEvoy, Rory" <RMcEvoy@edwardswildman.com>

To: "ronald j. wronko (ron@ronwronkolaw.com)" <ron@ronwronkolaw.com>

Sent: Friday, May 17, 2013 12:46 PM

Subject: Varughese Deposition

Ron:

Now that Judge Francis has ordered Dr. Varughese to appear for more than one day of deposition, please provide me with dates on which you and your client are available between May 23 and May 31. I am not available on May 30 and May 28 is Memorial Day. I would suggest that we schedule two additional days and we will see how it goes. If two dates between May 23 and 31 are not convenient for you and your client, I am willing to agree to extend the time to complete the plaintiff's deposition. We will, of course, need to make a prompt application to Judge MacMahon early next week. In that regard, I will not be able to complete Dr. Varughese's deposition until I receive and have time to review the documents, particularly the tape recordings, that are the subject of the letter that I sent to you earlier this week.

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